

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

EDMUND HENNESSY,

Plaintiff,

v.

DEPARTMENT OF CORRECTION,
COMMISSIONERS, KATHLEEN DENNEHY
(former), HAROLD W. CLARKE (present);
SOUZA-BARANOWSKI CORRECTIONAL
CENTER, SUPERINTENDENTS, LOIS
RUSSO (former), THOMAS DICKHAUT,
(present); MCI-SHIRLEY MEDIUM,
SUPERINTENDENT, DUANE
MACEACHERN; UMASS CORRECTIONAL
HEALTH SERVICES, EMPLOYEE'S,
DOCTOR ANGELES, DOCTOR HAZARD,
DOCTOR ENAW, DOCTOR ARTHUR
BREWER, NURSE PRACTITIONER, LINDA
BOOTH; DEPARTMENT OF
CORRECTIONAL HEALTH SERVICES,
EMPLOYEE, DIRECTOR TERRE
MARSHALL,

Defendants.

Civil Action No. 08-11724-PBS

PLAINTIFF'S MOTION TO AMEND COMPLAINT

Pursuant to Rule 15(a) of the Federal Rules of Civil Procedure, Plaintiff Edmund Hennessy ("Plaintiff") hereby moves this Court for leave to file his Second Amended Complaint ("Second Amended Complaint"). As is discussed more fully in the Memorandum in Support of Plaintiff's Motion to Amend Complaint, which is filed herewith, leave to amend the complaint, which is to be "freely given when justice so requires," Fed. R. Civ. P. 15(a), should be granted here. A copy of the proposed Second Amended Complaint ("Amended Complaint") is attached hereto as Exhibit A.

WHEREFORE, Mr. Hennessy respectfully requests that this Court grant him leave to amend his Complaint.

Dated: November 16, 2011

Respectfully submitted,

Edmund Hennessy

By his attorneys,

/s/ Kathleen E. Roblez

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CERTIFICATE OF SERVICE AND LOCAL RULE 7.1(a)(2) CERTIFICATION

I, Kathleen Roblez, hereby certify that, pursuant to Local Rule 7.1(a)(2), I have conferred with Defendants regarding the relief requested in this Motion and have attempted in good faith to resolve or narrow the issues presented, but have been unable to do so.

I further certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), and that paper copies will be sent to those indicated as non-registered participants on November 16, 2011.

/s/ Kathleen E. Roblez